

**LEAF LEGAL, P.C.**

-- Attorneys at Law --

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December 20, 2023

Honorable Judge Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*Granted.*  
*Judge Cote*  
*12/21/23*

RE: Tereshchenko v. Karimi  
Case No: 23-cv-2006

Dear Judge Cote,

In response to the Court's directive upon our joint motion seeking permission for remote testimony of foreign witnesses dated December 19, 2023, we submit the following list of witnesses the defense intends to call at trial:

1. Afonin Dmytro Serhiiovych<sup>1</sup> – Forensic Expert in Video Surveillance Recordings (Affidavit to be provided as exhibit).
2. Elizabeth McShow Baraya<sup>2</sup> – Yasamin Karimi's Childhood Friend (Affidavit to be provided as exhibit).
3. Alexander Savostin<sup>3</sup> – Expert Forensic Psychologist from Ukraine (Affidavit to be provided as exhibit).

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<sup>1</sup> Requesting appearance via video because of legal impediment to travel from the Ukraine.

<sup>2</sup> Requesting appearance via video because of legal impediment to travel with Ukrainian passport.

<sup>3</sup> Requesting appearance via video because of legal impediment to travel from the Ukraine.

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4. Ekaterina Malichenko<sup>4</sup>—Ukrainian Attorney Representing Respondent in Custody and Appeal and Expert in Ukrainian Law (Affidavit to be provided as exhibit).

Opposing counsel has consented to the foregoing. Thank you for your consideration of this issue.

Respectfully Submitted,

/s/  
Stephanie R. Schuman, Esq.

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<sup>4</sup> Requesting appearance via video because of legal impediment to travel from the Ukraine.